

VERNON ENVIRONMENTAL, INC.

3524 255th Lane SE, Issaquah, Washington 98029

P/C/F 206.686.2469

October 5, 2007

Mr. Bruce Tiffany, P.E.
King County
130 Nickerson Street
Suite 200
Seattle, WA 98109

Ms. Beth Schmoyer, P.E.
Seattle Public Utilities
Key Tower
700 Fifth Avenue
Seattle, WA 98104

Re: **Rainier Commons Meeting Held on October 4, 2007 at 3100 Airport Way
South, Seattle, WA 98134 (the, "Site")**

Dear Mr. Tiffany and Ms. Moyer:

This letter shall confirm Rainier Common's understanding of next steps to be performed in concert with King County (the, "KC"), Seattle Public Utility (the, "SPU"), Vernon Environmental (the, "VEI") and Rainier Commons (collectively the, "Group"). On October 4, 2007 KC's Bruce Tiffany and Arnaud Girard, SPU's Beth Schmoyer, VEI's Conrad Vernon, and Rainer Commons' Eitan Alon and John Jack met to discuss potential catch basin sediment containing polychlorinated biphenyl (the, "PCB") that may potentially be discharged from the Site to the Duwamish waterway and wastewater treatment facility located at the Magnolia, Washington treatment facility via KC and SPU storm drains and combined sewer overflows.

VEI compared past SPU PCB analytical results from its October 12, 2005 stormwater pollution prevention catch basin inspection and VEI's catch basin analytical results collected in June 2006 at the Site. VEI showed the concentrations of PCB analytical results, found in the Site catch basin sediments, had decreased from SPU's highest sample concentration of 2,200 mg/kg located in catch basin CB 12 to VEI's CB 12 sediment PCB sample result concentration of non-detect (at a Method Reporting Limit of 0.20 mg/kg) by Advanced Analytical laboratory located in Redmond, WA. SPU and VEI catch basin analytical result trends are presented below.

SPU October 2005 Rainier Commons Catch Basin Sediment Analytical Results (PCB A1254)	VEI June 2006 Rainier Commons Catch Basin Sediment Analytical Results (PCB A1254)
BNSF CB-1: 17 mg/kg	BNSF CB-1: 4.3 mg/kg
BNSF CB-2: 23 mg/kg	BNSF CB-2: Non-Detect (ND)
CB-14: 175 mg/kg	CB-14: 0.51 mg/kg
CB-8: 1,340	CB-8: 3.2 mg/kg
CB-1 through CB-6 (composite): 19.8 mg/kg	CB-1: 0.54 mg/kg; CB-2 through CB-6: ND
CB-12: 2,200 mg/kg	CB-12: ND

In an effort to determine whether the PCB source was a result of paint chips released from the facility during painting operations, VEI also collected a paint chip sample. The sample analytical result showed the paint contains 2,300 mg/kg PCB A1254. Based on the paint sample analytical result compared to SPU's catch basin sediment highest PCB analytical result of 2,200 mg/kg, it is highly feasible the paint chips are the source of catch basin sediment impact that may be a result of paint chips migrating from paint chip removal activities to the catch basins during surface run-off precipitation events. Remaining PCB paint on the exterior of the building has been encapsulated through the application of new paint. Moreover, Rainier Commons implemented its PCB Paint O&M Plan in its effort to prevent any future release.

It is Rainier Commons' position that the paint chips are no longer present above regulatory concentration limits in the Site catch basin sediments as the analytical trends show over time. It is Rainier Commons' understanding that KC and SPU are identifying immediately adjacent and hydraulically down gradient catch basin sample locations to the Site. Further, KC and SPU will sample the sediments and storm/wastewater of those identified locations and provide sufficient notice (preferably 10-business days) to VEI before KC's and SPU's sampling event so VEI may be present during split sampling activities, chain of custody and transportation to the selected analytical laboratory(s). Prior to the sampling event VEI requests a copy of KC's and SPU's Field Sampling Plan and/or any other field work plan, i.e., QA/QC Plan, SOPs, so it can incorporate them into VEI's field work plans.

In the meeting the Group agreed that VEI should provide a new Site figure that shows (combines) the KC, SPU and VEI catch basin sampling locations numbering system. VEI will provide the figure at the time of its delivery of its analytical sample results report.

On behalf of Rainier Commons, VEI appreciates the opportunity to work with KC and SPU to bring this matter to mutually agreed closure. If you have any issues, questions or comments please contact Conrad Vernon at 206.686.2469 or conrad.vernon@vernonenvironmental.com.

Respectfully,
Vernon Environmental, Inc.



Conrad Vernon
Principal Consultant

Cc: Eitan Alon/Rainier Commons

Enclosure(s): Rainier Commons' FSP, DQO, QA/QC Field Work Plans/PCB Paint O&M Plan/2006 Final Catch Basin Sediment Investigation Report

Catch Basin Sediment Field Sampling Plan

Former Rainier Brewery Property

1.0 Site Background

The former Rainier Brewery property is an approximate 4.57-acre parcel located at 3100, Airport Way South, Seattle, WA (the, "Site"). The Site is bound between South Stevens Street to the north, by South Horton Street to the south, by Interstate-5 to the east and Airport Way South to the west. Rainier Commons, LLC (the, "Rainier") owns the Site, which is operated by Ariel Development, Inc. (the, "Ariel"). One-third of the Site is leased to Tully's Coffee. Tully's roasts, grinds, packages, distributes coffee and operates its corporate headquarters on the premises. Ariel also operates its corporate headquarters on site.

The Site was initially developed in the late 1800s as a brewery and functioned in a similar capacity until 1996. The Site has been owned by several entities since its initial development. Separate phases of Site redevelopment has occurred throughout its history. The Site is currently being redeveloped into community mixed use, including but not limited to, residential, commercial and retail space.

Farallon Consulting, Inc. (the, "Farallon") conducted a Phase I Environmental Site Assessment on April 14, 2004. Farallon reported, from their Site reconnaissance, nine (9) pad-mounted electrical transformers at various locations throughout the Site. Farallon also observed oil staining at floor drains adjacent to transformer vaults within several of the buildings and adjacent to abandoned equipment. They did not identify the transformer locations and associated vaults or drains as a Recognized Environmental Condition. Ariel states all of the existing onsite transformers are non-PCB containing.

On October 12, 2005 the City of Seattle's Public Utilities Department (the, "SPU") conducted a stormwater pollution prevention inspection at the Former Rainier Brewery property. Preliminary analytical data from the sediment sampling event at the Site showed concentrations of PCBs (up to 2,200 mg/kg) in the sediment collected from the following locations: the breezeway trench drain, the catch basins in the tank farm area, and two catch basins in the southwest parking lot adjacent to the building and north of the loading dock. Due to the elevated concentrations of PCBs in the sediments, the SPU directed Ariel to employ a consultant/contractor to assist in proper disposal of the material according to appropriate state and federal regulations. They also, directed Ariel to clean all outdoor inlets/trench drains/catch basins/pipes on its property. The SPU recommended additional sampling and analysis of the materials in subject structures to ensure adequate disposal methods are employed. Ariel received the SPU's Corrective Action Letter dated November 22, 2005 directing Ariel to cleanup the affected Site sediments within 30-days.

Ariel received another SPU letter dated January 6, 2006 regarding "Follow-up to Site Meeting on December 12, 2005" which included an extension of their original request to have Ariel cleanup the Site within 30-days. Ariel formally notified the Washington State Department of Ecology (Ecology) about the presence of PCB concentrations in their catch basin sediments during a meeting between Ecology (Dan Cargill) and Ariel (Eitan Alon and its consultant Conrad Vernon of VEI) on January 24, 2006. Ariel agreed to meet the following SPU required compliance contingencies:

- Meeting the content of the SPU's corrective action letter dated November 22, 2005,
- Hiring of a consultant that is experienced in PCB remediation and disposal,
- Jet-cleaning of all lines connecting catch basins (with PCBs in the sediments) to remove any residual contaminated sediment in the lines,
- Notifying the Department of Ecology of the finding of significant concentrations of PCBs at your site as required by law,
- Keeping SPU apprised of ongoing work at the site in a timely manner,
- Showing continuing forward progress with the cleanup, and
- Meeting with SPU on a quarterly basis to re-evaluate the situation. Quarterly meetings commencing in early March 2006.

During Ariel's January 24, 2006 meeting with Ecology, the SPU's catch basin sediment sampling results and Ecology's regulatory approach for the ultimate cleanup of the Site sediments were discussed and agreed. The following items (in order of priority) were identified:

- Provide Methodology Plan for identifying underground subject pipes,
- Identify underground subject pipes with a dye study or other equivalent means to Ecology's satisfaction,
- Provide an as-built drawing of subject underground pipes including inlet points, catch basins, manholes, etc.
- Provide Field work Plans, i.e., Field Sampling Plan, Data Quality Objectives Plan, Quality Assurance/Quality Control (QA/QC) Plan and Health & Safety Plan,
- Collect manhole and catch basin sediment samples, analyze samples, report analytical results,
- Provide a Remedial Action Plan to cleanup the Site sediments in pipes and collection points (i.e., cleanup the catch basin and manhole sediments, as well as jet clean the pipes), and
- Implement the Remedial Action Plan.

Ariel has located and identified subject underground pipes on the Site and has provided an as-built drawing presenting the aforementioned utilities (Figure 1). The Field Work Plans, i.e., Sampling Plan, Data Quality Objective Plan, Quality Assurance/Quality Control Plan and the Health & Safety Plan are the next step in complying with the overseeing regulatory authorities requirements.

Sediment Analytical Results:

- SPU sampled six (6) sediment sample points for the presence of PCBs at locations discussed above. The analytical results from each location are BNSF CB1-17 mg/kg, BNSF CB2-23 mg/kg, CB 14-175 mg/kg, CB 8-1,340 mg/kg, composite of CB1 through CB6-19.8 mg/kg and CB12-2,200 mg/kg (Figure 1).

Chemical(s)-of-concern (PCBs) will be compared to Ecology's MTCA Method A cleanup levels of 1.0 mg/kg in a soil matrix. Guidance promulgated under federal statutes 40 CFR 761 is also referenced.

This Field Sampling Plan is prepared for on-site sampling activities. The plan includes:

- ◆ Sampling objectives
- ◆ Sample location and frequency
- ◆ Sample Designation
- ◆ Sampling equipment and procedures
- ◆ Sample handling and analysis

2.0 Sampling Objectives

The sampling objectives, for this sampling event, are to identify on-site PCBs and their respective concentrations in sediments at catch basin locations. Analytical results will be used to determine future soil collection and analysis, as well as, remediation points of cleanup compliance.

Another objective is to demonstrate data identification; decision inputs, decision rule development, decision error limits and design optimization are addressed.

3.0 Sample Location and Frequency

Figure 1 shows the proposed sediment grab/composite sample locations (these are numbered catch basins). The catch basins and trench drains collect surface drainage and convey it to the storm drain lines (pipes). Selection of these locations assumes the sediment grab/composite sample locations cover the impacted area(s) of the underground stormwater utilities and the samples are at locations hydraulically down-gradient in the drainage system and will therefore, be representative of Site underground utility conditions.

Sediment samples will be collected and analyzed from each catch basin location during this sampling event as a matrix of five (5)-point grab/composite sediment samples (Section 5).

4.0 Sample Designation

Collected sediment samples will be designated as shown in Table 1. Sampling guidelines are provided in Table 2. The sampling point locations include a center point and the four (4) corners of each catch basin. Sediment samples will be collected for one chemical-of-concern, i.e., PCBs at each sample location.

One (1) duplicate sample at every 10th catch basin will be collected for quality control purposes.

5.0 Sample Equipment, Procedures and Handling

Vernon Environmental, Inc. (VEI) will collect sediment grab/composite samples at the locations identified.

EPA prescribed method protocols regarding sample collection, cross contamination prevention, sample preservation, sample container type, sample holding temperature, and holding times will be followed (Table 2).

Sediment Sample Collection

Gloves will be worn at all times while collecting sediment samples. Descriptions of field observations (including oil sheens and potential contributing activities) and sample characteristics (odor, amount and type of particles being removed, size description, color) will be included in field notes recorded during sample collection.

Catch Basin Sediment

Catch-basin sediment samples will be collected using stainless steel spoons and long-handled scoops or soil coring devices. Samples will be collected from the top 3-4 inches of sediment accumulated in the catch basin sump or in-line structure. Individual aliquots will be collected from at least five locations in the sump/structure, placed in a stainless steel bowl, and thoroughly mixed. Any particles greater than 2 centimeter in size will be removed from the sample and discarded. After mixing, a 250gram aliquot sample will be removed and placed into pre-cleaned sample containers provided by the analytical laboratory. Samples will be placed in a cooler and stored on ice until delivered to the analytical laboratory

Equipment Decontamination

All sampling equipment including stainless-steel materials will be decontaminated prior to each sampling event. The following decontamination procedures will be followed after every sampling event:

Stainless-Steel Scoop and Mixing Bowl

- Phosphate-free detergent wash and tap water rinse
- Reagent-grade water rinse
- Ultra-pure methanol rinse
- Air dry
- Wrapped in new aluminum foil and bagged in plastic.

After the decontamination procedures have been completed, the sampling equipment will be capped or sealed with new aluminum foil and the sampling device will be protected and kept clean.

Each sample will be clearly marked with the date and time of sample collection, sample collection technician's name, unique sample identification, preservative used and analysis to be performed. Each sample will be sealed with chain-of-custody tape. Each sample cooler will contain blue ice (or equivalent) to keep the temperature below 40 degrees Fahrenheit. Each sample cooler will be chain-of-custody sealed and a chain-of-custody form will be completed in triplicate and placed in the cooler prior to sealing and shipment.

6.0 Sample Analysis

Collected sediment sample analyses are presented in Table 1.

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Data Quality Objectives, Conceptual Site Model and
QA/QC Plan

Attached

Catch Basin Locations

Figure 1

Sample Designation

Table 1

Sampling Guidelines

Table 2

VERNON ENVIRONMENTAL, INC.

3949 Klahanie Drive SE, #9202, Issaquah, Washington

P/C/F 206.686.2469

Final
Catch Basin Sediment Field Sampling Plan

**Former Rainier Brewery Property
3100 Airport Way South
Seattle, Washington
King County**

Prepared for:

**Rainier Commons, LLC
c/o Ariel Development, LLC
Eitan Alon
3100 Airport Way South
Seattle, WA 98134**

Prepared by:

**Vernon Environmental, Inc.
3849 Klahanie Drive SE, Suite 9202
Issaquah, Washington 98029**

May 2006

RCLLC 0003930

Attachment

Data Quality Objectives, QA/QC Plan, Conceptual Site Model

Tables and Figures

TABLE 1
SAMPLE DESIGNATION

Collected Analytical Samples				
Rainier Commons, LLC-Ariel Development Former Rainier Brewery Property 3100 Airport Way South, Seattle, WA			Sample Date: TBD 2006	
Matrix	Parameters	Method	TAT (days)	Number of Samples per Catch Basin Location
Catch Basin Sediments	PCBs	EPA 8082	10	1*
Duplicate	PCBs	EPA 8082	10	*

**Each sample location will consist of 1-sample collected as a grab composite sediment sample from a five- (5) point matrix (1-center and 4-corners of each catch basin).*

**Duplicate samples to be collected at every 10th catch basin*

TABLE 2
SAMPLING GUIDELINES

Catch Basin Sediment Sampling Guide - Former Rainier Brewery					
Analysis	Specific Method	Container	Preservation	Hold (days)	Amount Needed
Polychlorinated Biphenyls by EPA Method 8082					
in Soil					
8082 PCB Only	EPA 8082	Glass jar w/PTFE seal	Store cool at 4°C	14	250 grams
Polychlorinated Biphenyls by EPA Method 8082					
in Wipe					
8082 PCB Only	EPA 8082	Glass jar w/PTFE seal	Store sealed at STP	14	One wipe in Hexane

Quality Assurance/Quality Control (QA/QC) Plan

Former Rainier Brewery Property

1.0 Introduction

The purpose of the QA/QC Plan is to relate project objectives to specific measurements required to achieve those objectives. This Plan will provide sufficient detail to demonstrate the following:

- ◆ Intended measurements are appropriate for achieving project objectives
- ◆ Quality control procedures are sufficient for obtaining data of known and adequate quality
- ◆ Such data will be defensible if challenged technically or legally

This QA/QC Plan will support analytical results, which may be used to evaluate and select basic options required to draft a Corrective Action Plan and to assess unexplored areas on the site, which may lead to further investigation. The Sampling Plan contains many of the elements that are required in this QA/QC Plan. In an effort to prevent confusion for field technicians, chemists and reviewers please reference the Sampling Plan and Data Quality Objective Plan for the following QA/QC elements.

- ◆ The site background and environmental overview
- ◆ Statement of project objectives
- ◆ Sample collection design for critical and non-critical measurements
- ◆ Tabular summary for type and number of samples, sampling points, quality control and reserve sample collection and analysis
- ◆ Tabular summary of conventional chemistry parameters
- ◆ Sample collection schedule
- ◆ Applicable regulations
- ◆ Sampling site location, procedures, frequency, affected media and validity
- ◆ Analytical laboratory methods, e.g., EPA Standard Methods

- ◆ Quality control checks
- ◆ Required containers, holding times and preservation techniques

2.0 Project Organization and Responsibilities

Figure 1 presents the project's organizational chart. The Washington State Department of Ecology (Ecology) is responsible for the overall project. The Ecology Project Manager is Dan Cargill.

The Former Rainier Brewery Property is owned by Rainier Commons, LLC. Eitan Alon represents the LLC.

Conrad Vernon of Vernon Environmental, Inc. is an environmental consultant to the Project LLC and is responsible for project management. Technical and administrative elements are included in his project management responsibilities.

Conrad Vernon of Vernon Environmental, Inc. is the quality assurance manager for this project as well. He is responsible for writing and following through with the data quality objectives, sampling plan and QA/QC plan.

Kortland Orr of North Creek Analytical Laboratories is responsible for managing collected sample analyses. He is also responsible for sample preparation and ensuring the laboratory's QA/QC results are valid.

TBD of Vernon Environmental, Inc. is responsible for sample collection, preservation, holding times and transport. He is also responsible for field related QA/QC objectives, as well as, health and safety.

3.0 Quality Assurance Objectives

The following text presents the projects quantitative objectives. Quantitative objectives include analytical result precision, accuracy, method detection limits and completeness. Table 1 presents the quantitative objectives for this project.

Qualitative quality assurance objectives include data set comparability and representativeness. Comparability will be achieved by using consistent sample collection and analytical methods. Vernon Environmental is a reliable source for field related sample collection activities. North Creek Analytical is a reliable source for analytical method protocols. Representativeness will be achieved by collecting an adequate number of unbiased samples. The data quality objectives attached to the sampling plan assist in making this determination.

Completeness will also be part of this plan. A ninety (90) percent goal has been established (90% of the total number of samples collected and analyzed will have results that pass data validation).

4.0 Sample Custody

Proper sample custody ensures that analytical results will not be compromised during transportation and storage. Records of everyone involved with handling the samples will be maintained so that a sample history can be reconstructed later, should the need arise. Please reference the Sampling Plan regarding how sample custody will be maintained and recorded from the field to the laboratory. Typical chain-of-custody reports, sample container labels, and custody seals will be used.

North Creek Analytical Laboratory is responsible for in-house chain-of-custody. Sample tracking will be recorded throughout laboratory locations for unpacking, extracting, and analysis. A paper trail will be provided to document intra laboratory chain-of-custody. Also, North Creek will document proper disposal of all samples.

5.0 Data Reduction, Validation and Reporting

Figure 2 shows the overall schematic of data flow. The schematic flow chart indicates the process for data handling, collection, transfer, storage, recovery and review for field and laboratory operations.

5.1 Data Reduction

Kortland Orr and Conrad Vernon will be responsible for data reduction. EPA and ASTM Standard Methods for data reduction procedures will be followed. Analytical results will be compared to QA/QC parameters for each analyzed chemical. Blanks will be included in determining analyte concentration, if the blank samples are above method detection limits, by subtracting the blank sample concentration from the field sample concentration. All soil data will be reported on a dry weight basis.

5.2 Data Validation

The data validator will review all analytical results and compare them to established QA/QC controls (reference the Sampling Plan). The validator will flag data outliers.

5.3 Data Reporting

The data validation subcontractor will be responsible for reporting analytical as well as QA/QC results. Conrad Vernon will prepare the data report with input from the field technician regarding hydrogeologic data, field notes, sample plan changes, and health and safety. Please reference the Sampling Plan for reviewing matrix, units of measurement, etc.

6.0 Calculation of Data Quality Indicators

Precision will be calculated from duplicate measurements relative percent difference (RPD).

$$RPD = \frac{(C1 - C2) \times 100\%}{(C1 + C2) / 2}$$

where: RPD = relative percent difference
C1 = larger of the two observed values
C2 = smaller of the two values

Accuracy will be calculated as percent recovery involving matrix spike measurements (%R).

$$\%R = 100\% \times (s - u / Csa)$$

where: %R = percent recovery
S = measured concentration in spiked aliquot
U = measured concentration in unspiked aliquot
Csa = actual concentration of spike added

Completeness will be defined as percent completeness.

$$\%C = 100\% \times (V / N)$$

where: %C = percent completeness
V = number of measurements judged valid
N = total number of measurements necessary to achieve a specified level of confidence in decision making

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Figure 1: Project Organizational Chart

Figures 2: Data Flow Schematic

Table 1: QA Quantitative Objectives

VERNON ENVIRONMENTAL, INC.

3949 Klahanie Drive SE, #9202, Issaquah, Washington

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Final
QA/QC Plan

**Former Rainier Brewery Property
3100 Airport Way South
Seattle, Washington
King County**

Prepared for:

**Rainier Commons, LLC
c/o Ariel Development, LLC
Eitan Alon
3100 Airport Way South
Seattle, WA 98134**

Prepared by:

**Vernon Environmental, Inc.
3849 Klahanie Drive SE, Suite 9202
Issaquah, Washington 98029**

May 2006

RCLLC 0003940

Tables and Figures

**Quality Assurance Project Plan Approval Form
For
Former Rainier Brewery Property**

Project ID No.: 031506

Work Plan No.: 1

Client: Ariel Development

Client Contact: Eitan Alon

QA Project Plan Title: QA/QC Plan, Former Rainier Brewery Property

Commitment to Implement the Above QA Project Plan:

_____	_____	_____
Project Task Manager	Signature	Date

_____	_____	_____
QA/QC Manager	Signature	Date

_____	_____	_____
Other as Appropriate Affiliation*	Signature	Date

_____	_____	_____
Other as Appropriate Affiliation*	Signature	Date

_____	_____	_____
Other as Appropriate Affiliation*	Signature	Date

*Commitment signature is required for any ancillary sampling, analytical, or data gathering support provided by a subcontractor or principal investigator.

Approval to Proceed in Accordance to the above project plan:

_____	_____	_____
Technical Project Manager	Signature	Date

Concurrences:

_____	_____	_____
QA Project Manager	Signature	Date

_____	_____	_____
Regulator Project Manager (If Applicable)	Signature	Date

Figure 1

Project Organizational Chart

Former Rainier Brewery property

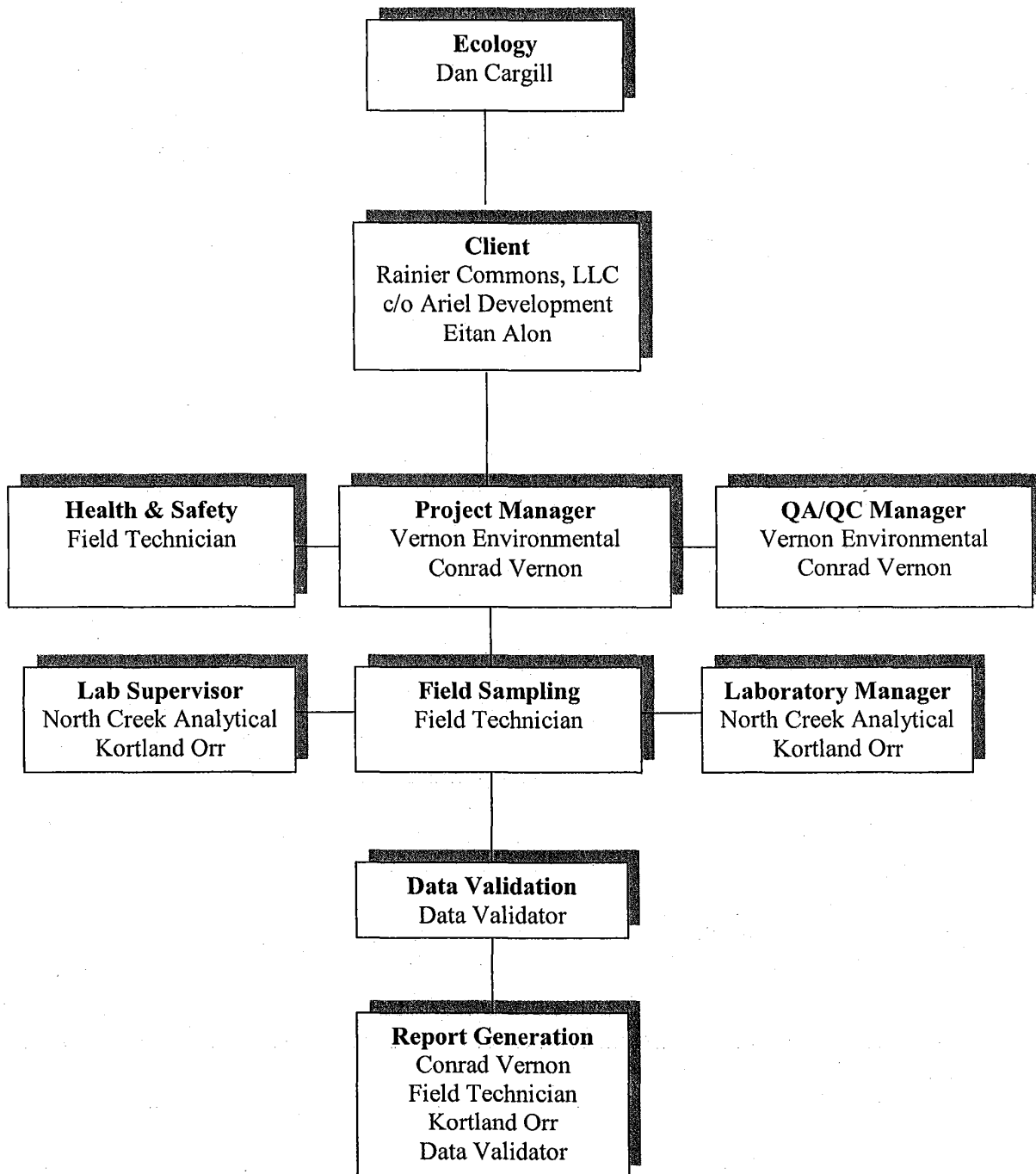


Figure 2

Data Flow Schematic (Data Reduction, Validation, Reporting)

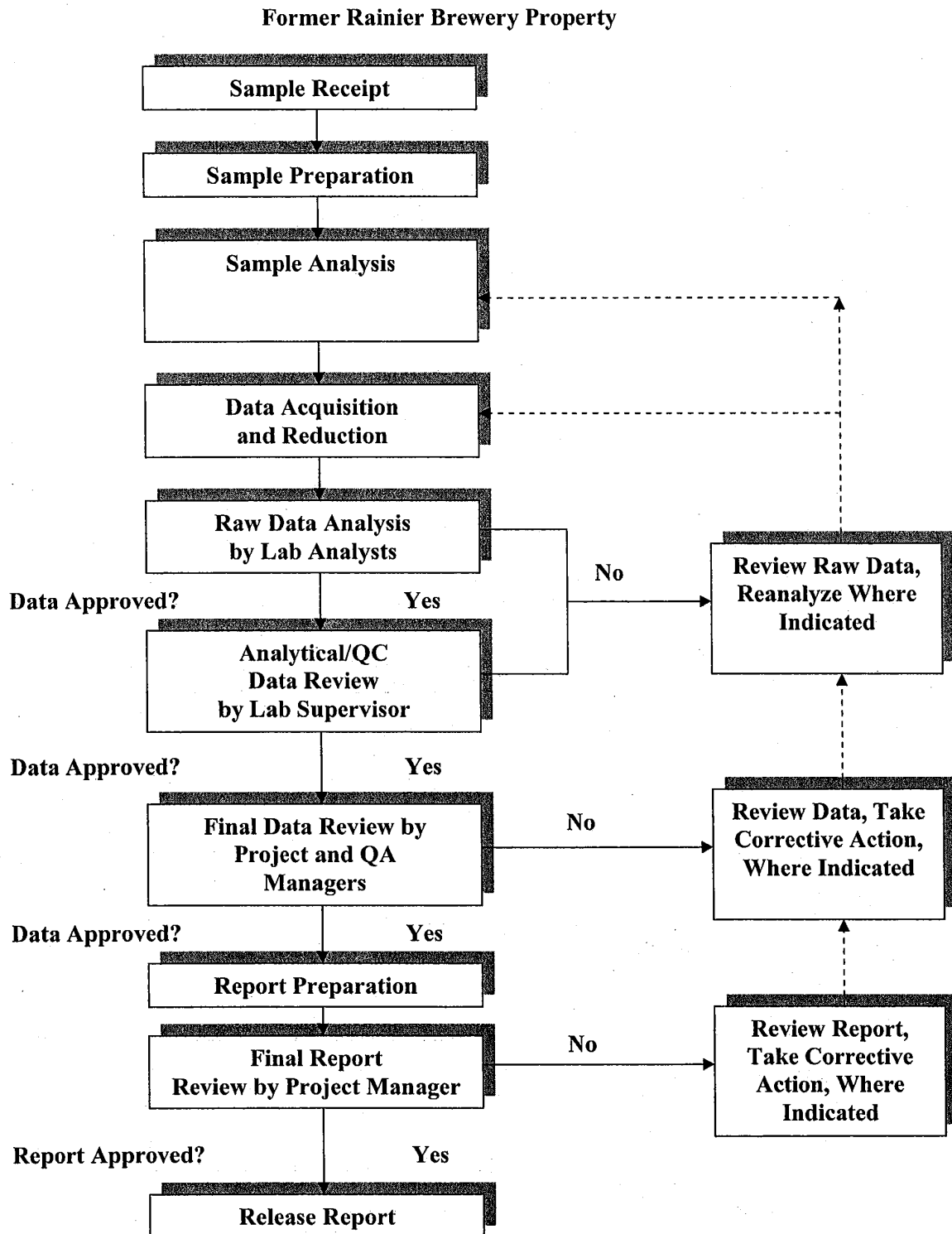


TABLE 1
QUANTITATIVE OBJECTIVES

Analytical Method Details

Method	Analyte	MDL	MRL Units	Surr. %R	DUP RPD	%R	Matrix Spike RPD	%R	Blank Spike RPD	CAS #
Polychlorinated Biphenyls by EPA Method 8082										
in Soil										
EPA 8082	Aroclor 1016	2.66	25.0 ug/kg dry wt	-	-	47-134	35	54-125	30	12674-11-2
EPA 8082	Aroclor 1016 [2C]	2.66	25.0 ug/kg dry wt	-	-	47-134	35	54-125	30	12674-11-2
EPA 8082	Aroclor 1221	13.3	50.0 ug/kg dry wt	-	-	-	-	-	-	11104-28-2
EPA 8082	Aroclor 1221 [2C]	13.3	50.0 ug/kg dry wt	-	-	-	-	-	-	11104-28-2
EPA 8082	Aroclor 1232	5.76	25.0 ug/kg dry wt	-	-	-	-	-	-	11141-16-5
EPA 8082	Aroclor 1232 [2C]	5.76	25.0 ug/kg dry wt	-	-	-	-	-	-	11141-16-5
EPA 8082	Aroclor 1242	2.08	25.0 ug/kg dry wt	-	-	-	-	-	-	53469-21-9
EPA 8082	Aroclor 1242 [2C]	2.08	25.0 ug/kg dry wt	-	-	-	-	-	-	53469-21-9
EPA 8082	Aroclor 1248	1.78	25.0 ug/kg dry wt	-	-	-	-	-	-	12672-29-6
EPA 8082	Aroclor 1248 [2C]	1.78	25.0 ug/kg dry wt	-	-	-	-	-	-	12672-29-6
EPA 8082	Aroclor 1254	1.49	25.0 ug/kg dry wt	-	-	-	-	-	-	11097-69-1
EPA 8082	Aroclor 1254 [2C]	1.49	25.0 ug/kg dry wt	-	-	-	-	-	-	11097-69-1
EPA 8082	Aroclor 1260	3.80	25.0 ug/kg dry wt	-	-	22-171	35	58-128	30	11096-82-5
EPA 8082	Aroclor 1260 [2C]	3.80	25.0 ug/kg dry wt	-	-	22-171	35	58-128	30	11096-82-5
EPA 8082	Aroclor 1262	1.46	25.0 ug/kg dry wt	-	-	-	-	-	-	37324-23-5
EPA 8082	Aroclor 1262 [2C]	1.46	25.0 ug/kg dry wt	-	-	-	-	-	-	37324-23-5
EPA 8082	Aroclor 1268	6.20	25.0 ug/kg dry wt	-	-	-	-	-	-	11100-14-4
EPA 8082	Aroclor 1268 [2C]	6.20	25.0 ug/kg dry wt	-	-	-	-	-	-	11100-14-4
EPA 8082	TCX		Surrogate	39-139	-	-	-	-	-	877-09-8
EPA 8082	TCX [2C]		Surrogate	39-139	-	-	-	-	-	877-09-8
EPA 8082	Decachlorobiphenyl		Surrogate	33-163	-	-	-	-	-	2051-24-3
EPA 8082	Decachlorobiphenyl [2C]		Surrogate	33-163	-	-	-	-	-	2051-24-3
Polychlorinated Biphenyls by EPA Method 8082										
in Wipe										
EPA 8082	Aroclor 1016	0.500	2.00 ug/Wipe	-	-	70-130	25	70-130	25	12674-11-2
EPA 8082	Aroclor 1016 [2C]	0.500	2.00 ug/Wipe	-	-	70-130	25	70-130	25	12674-11-2
EPA 8082	Aroclor 1221	0.500	2.00 ug/Wipe	-	-	-	-	-	-	11104-28-2
EPA 8082	Aroclor 1221 [2C]	0.500	2.00 ug/Wipe	-	-	-	-	-	-	11104-28-2
EPA 8082	Aroclor 1232	0.500	2.00 ug/Wipe	-	-	-	-	-	-	11141-16-5
EPA 8082	Aroclor 1232 [2C]	0.500	2.00 ug/Wipe	-	-	-	-	-	-	11141-16-5
EPA 8082	Aroclor 1242	0.500	2.00 ug/Wipe	-	-	-	-	-	-	53469-21-9
EPA 8082	Aroclor 1242 [2C]	0.500	2.00 ug/Wipe	-	-	-	-	-	-	53469-21-9
EPA 8082	Aroclor 1248	0.500	2.00 ug/Wipe	-	-	-	-	-	-	12672-29-6
EPA 8082	Aroclor 1248 [2C]	0.500	2.00 ug/Wipe	-	-	-	-	-	-	12672-29-6
EPA 8082	Aroclor 1254	0.500	2.00 ug/Wipe	-	-	-	-	-	-	11097-69-1
EPA 8082	Aroclor 1254 [2C]	0.500	2.00 ug/Wipe	-	-	-	-	-	-	11097-69-1
EPA 8082	Aroclor 1260	0.500	2.00 ug/Wipe	-	-	52-140	25	52-140	25	11096-82-5
EPA 8082	Aroclor 1260 [2C]	0.500	2.00 ug/Wipe	-	-	52-140	25	52-140	25	11096-82-5
EPA 8082	Aroclor 1262	0.500	2.00 ug/Wipe	-	-	-	-	-	-	37324-23-5

EPA 8082	Aroclor 1262 [2C]	0.500	2.00 ug/Wipe	-	-	-	-	-	-	37324-23-5
EPA 8082	Aroclor 1268	0.500	2.00 ug/Wipe	-	-	-	-	-	-	11100-14-4
EPA 8082	Aroclor 1268 [2C]		ug/Wipe	-	-	-	-	-	-	11100-14-4
EPA 8082	TCX		Surrogate	40-130	-	-	-	-	-	877-09-8
EPA 8082	TCX [2C]		Surrogate	40-130	-	-	-	-	-	877-09-8
EPA 8082	Decachlorobiphenyl		Surrogate	40-130	-	-	-	-	-	2051-24-3
EPA 8082	Decachlorobiphenyl [2C]		Surrogate	40-130	-	-	-	-	-	2051-24-3